

# Vinson&Elkins

Brandon M. Tuck btuck@velaw.com  
Tel +1.713.758.2271 Fax +1.713.615.5048

February 18, 2015

Leticia Lane  
FOIA Officer  
U.S. EPA, Region 6  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Re: FOIA Request for File SWG-2013-00982

Dear Ms. Lane,



This is a request under the Freedom of Information Act (5 U.S.C. § 552).

I am requesting a copy of EPA documents regarding the U.S. Army Corps of Engineers file SWG-2013-00982, which relates to an investigation of alleged unauthorized discharge of fill material into waters of the United States by Trendmaker Homes, Inc., or Trendmaker Clear Lake, LLC, at a 370-acre tract in Houston, Harris County, Texas. I request a copy of all EPA documents regarding this matter generally, and I specifically request all relevant documents, notes, e-mails, or other communications involving EPA Region 6 (for example, documents from Sharon Parish and Ken Teague) and EPA Headquarters (for example, documents from Rose Kwok and Russ Kaiser).

In order to help you determine my status for the purpose of assessing fees, you should know that I am affiliated with Trendmaker Homes, Inc., and Trendmaker Clear Lake, LLC. I am willing to pay the appropriate fees for this request. If you estimate that the fees will exceed \$200, please let me know in advance of incurring them.

You may reach me by telephone or e-mail to discuss any aspect of this request.

Very truly yours,

  
Brandon M. Tuck 

Vinson & Elkins LLP Attorneys at Law  
Abu Dhabi Austin Beijing Dallas Dubai Hong Kong Houston London  
Moscow New York Palo Alto Riyadh San Francisco Tokyo Washington

1001 Fannin Street, Suite 2500  
Houston, TX 77002-6760 United States of America  
Tel +1.713.758.2222 Fax +1.713.758.2346 [www.velaw.com](http://www.velaw.com)